

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

INSURANCE COMPANY OF NORTH
AMERICA,

§
§
§
§
§

V.

§ CIVIL ACTION NO. 4:13-cv-2682

GATEWAY SAFETY, INC., ET AL.

§ JURY

JOINT NOTICE OF SETTLEMENT

Plaintiff, Insurance Company of North America (“ICNA”), and defendants, Gateway Safety, Inc. d/b/a Gateway Safety Products, Ublester Rodriguez and Marisela Rodriguez, are pleased to notify the Court that they have completed the negotiation of their settlement terms. The parties respectfully request 60 days in which to complete the steps called for by their agreement and to submit an agreed order of dismissal.

Respectfully submitted,

/s/ Bryan P. Vezey
Joseph A. Ziemianski
Attorney in Charge
Texas State Bar No. 00797732
S.D. Tex. Bar No. 25915
1221 McKinney St., Suite 2900
Houston, Texas 77010
Telephone: (832) 214-3900
Telecopier: (832) 214-3905
E-mail: jziemianski@cozen.com

Of Counsel:

COZEN O'CONNOR

Bryan P. Vezey
Texas State Bar No. 00788583
S.D. Tex. Bar No. 19217
(Same firm, address and phone)
E-mail: bvezey@cozen.com

ATTORNEYS FOR PLAINTIFF,
INSURANCE COMPANY OF
NORTH AMERICA

/s/ Bogdan Rentea*
Bogdan Rentea
Attorney in Charge
Texas State Bar No. 1678100
S.D. Tex. Bar No. 22859
505 W. 12th Street, Suite 206
Austin, Texas 78701
Tel: (512) 472-6291
Fax: (512) 472-6278
E-mail: brentea@rentealaw.com

Of Counsel:

RENTEA & ASSOCIATES

Nathan Leake
Texas State Bar No. 24046277
Admitted *Pro Hac Vice*
(Same firm, address and phone)
E-mail: nleake@rentealaw.com

ATTORNEYS FOR
DEFENDANTS, GATEWAY
SAFETY, INC. D/B/A
GATEWAY SAFETY
PRODUCTS

/s/ Amy M. Carter*
Amy M. Carter
Attorney in Charge
Texas State Bar No. 24004580
3232 McKinney Ave., Ste. 610
Dallas, Texas 75204
Tel: (214) 276-7680
Fax: (214) 276-7699
E-mail: acarter@sgpblaw.com

Of Counsel:

SIMON GREENSTONE
PANATIER BARTLETT

ATTORNEYS FOR
DEFENDANTS,
UBLESTER RODRIGUEZ AND
MARISELA RODRIGUEZ

** (signed by permission)*

** (signed by permission)*

CERTIFICATE OF SERVICE

I certify that a true copy of this document was served on all counsel of record, listed below, via the Court's electronic filing system on April 18, 2014.

Bogdan Rentea
Rentea & Associates
505 W. 12th Street, #206
Austin, Texas 78701
Attorney for Gateway Safety, Inc. d/b/a Gateway Safety Products

Amy M. Carter
Simon Greenstone Panatier Bartlett, PC
3232 McKinney Avenue, Suite 610
Dallas, Texas 75204
Attorney for Defendants Ublester Rodriguez and Marisela Rodriguez

/s/ Bryan P. Vezey
Bryan P. Vezey